

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PARAMOUNT PARKS INC.

Plaintiff,

v.

LESTER NAIL

Defendant.

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Case No. 07 CV 10595 (SHS)

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**NOTICE OF MOTION FOR PROTECTIVE ORDER  
AND ATTORNEYS' FEES**

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PLEASE TAKE NOTICE that, upon the upon the declaration of Jill S. Kirila dated May 1, 2008 and the accompanying memorandum of law and pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Plaintiff Paramount Parks Inc. ("PPI") will move this Court for a protective order prohibiting Defendant from deposing Richard Kinzel, the Chief Executive Officer of Cedar Fair, L.P. ("Cedar Fair"), and its subsidiary company PPI, for the attorneys' fees associated with make this motion and for such other and further relief as may be just and proper.

Pursuant to Local Civil Rule 6.1 (a), any opposing affidavits and answering memoranda shall be served within four business days after service of the moving papers.

Dated: New York, New York  
May 2, 2008

Respectfully submitted,

**SQUIRE, SANDERS & DEMPSEY L.L.P.**

By: /s/ Jill S. Kirila

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